

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

American E Group, LLC

Plaintiff

No. 18-cv-3969-GHW

v.

Livewire Ergogenic Inc

Defendant

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LIVER WIRE ERGOGENICS, INC.,

Counterclaim Plaintiff/
Third-Party Plaintiff,

Against,

AMERICAN E GROUP, LLC,

Counterclaim Defendant,

against-

ELANA HIRSCH A/KIA ELANA MICHELLE
HIRSCH A/KIA ELANA BARKATS, JS BARKATS PLLCS and SUNNY JOSEPH BARKA TS
A/KA/
SANNY JOSEPH BARKATS,

Third-Party Defendants

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INITIAL DISCLOSURES FRCP 26(a)(1)

In accordance with Rule 26(a)(1) of the Federal Rules of Civil Procedure Third Party Defendant Sunny J. Barkats and JSBarkats PLLC, by and through his attorney, Joseph Paukman, respectfully makes mandatory disclosures as follows:

1. Witness, the name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjectsof the

information.

Bill Hodson CEO of livewire Ergogenic as to the retainer he signed with JSBarkats PLLC.

More may be added after discovery

2. A copy of, or description by category and location of, all documents, data, compilations and tangible things in the possession, custody or control of the party, and that the disclosing party may use to support its claims or defenses, unless solely for impeachment

More will be known after discovery

3. A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.

Will be available after discovery

4. Any insurance agreement under which any person carrying on an insurance business may be liable to satisfy all or part of a judgment which may be entered in the action to indemnify or reimburse for payments made to satisfy the judgment.

Not applicable

Dated: July 18, 2016

Respectfully submitted,

JOSEPH PAUKMAN

/s/Joseph Paukman

Attorneys for Third Party Defendants, Sunny Barkats, JSBarkats pllc

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